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and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case No. 19 - 30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF KEVIN J. ORSINI IN
SUPPORT OF DEBTORS' OBJECTION
TO MOTION OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
TO COMPEL PRODUCTION OF THIRD
PARTY CONTRACTOR DOCUMENTS**

Re: Dkt. No. 3205
Date: August 27, 2019
Time: 9:30 a.m. PST
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: August 13, 2019

1 Pursuant to 28 U.S.C. § 1746, I, Kevin J. Orsini, hereby declare under penalty of perjury as follows:

2 1. I am a Member of Cravath, Swaine & Moore LLP (“**Cravath**”), counsel to Pacific Gas
3 and Electric and PG&E Corporation (collectively, “**PG&E**” or the “**Debtors**”) in the above-captioned
4 Chapter 11 Cases. I am admitted to practice in the State of New York and am admitted to practice
5 before this Court *pro hac vice*. (See Dkt. No. 88). I submit this Declaration in Support of the Debtors’
6 Objection to Motion of the Official Committee of Tort Claimants to Compel Productions of Third
7 Party Contractor Documents. I have personal knowledge of the facts set forth in this declaration.

8 2. Attached hereto as Exhibit A is a true and correct copy of a cover letter accompanying
9 a document production from Cravath, sent on behalf of the Debtors, to the Official Committee of Tort
10 Claimants, dated July 30, 2019.

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12 Dated: August 13, 2019

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14 Kevin J. Orsini

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16 Cravath, Swaine & Moore LLP
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